

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Action No.: 04-11878-RCL

QWEST COMMUNICATIONS INTERNATIONAL INC., a Delaware corporation,

Plaintiff,

v.

CONQWEST, INC., a Massachusetts corporation,

Defendant.

**STIPULATED MOTION TO AMEND PRETRIAL SCHEDULE AND ENTER
PROTECTIVE ORDER**

The parties, through their counsel, hereby stipulate and agree as follows:

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.2

The parties have jointly consulted regarding this Stipulated Amendment pursuant to Local Rule 7.2 and stipulate and agree to the entry of this motion as an order of the Court.

1. The parties have had extended discussions regarding settlement in this case and have delayed discovery and conserved costs as a part of those discussions.

2. As a result of the extended discussions of settlement, the parties seek to reschedule the deadlines in this case to facilitate the completion of the case if the case is not settled at the Settlement Conference.

3. The parties jointly request the Court amend the Scheduling Order to reflect to following dates:

- a. Fact discovery, including depositions, due by November 15, 2005;
- b. Plaintiff to disclose expert witnesses by December 30, 2005;
- c. Defendant to disclose expert witnesses by February 15, 2006;
- d. Final discovery due by April 1, 2006;
- e. Motions due by May 1, 2006;

4. The parties stipulate and agree to the entry of the proposed Protective Order submitted to this Court on February 11, 2005 which was rejected by the Court on June 4, 2005.

Respectfully submitted this 29th day of June, 2005.



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